

**K&L GATES LLP**

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L'Oréal USA, Inc.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

STEVEN J. TRZASKA,

Plaintiff,

v.

L'ORÉAL USA, INC. and L'ORÉAL,  
S.A.,

Defendants.

Civil Action No.  
2:15-cv-02713-SDW-SCM

**DEFENDANT L'ORÉAL USA,  
INC.'S NOTICE OF MOTION TO  
DISMISS PLAINTIFF'S  
COMPLAINT**

**Motion Returnable July 6, 2015  
Oral argument is requested**

**COUNSEL:**

**PLEASE TAKE NOTICE** that on July 6, 2015, at 9:00 a.m., or as soon thereafter as counsel may be heard, Defendant L'Oréal USA, Inc., through its counsel K&L Gates LLP, shall move before the Honorable Susan D. Wigenton, U.S.D.J., at the Martin Luther King, Jr. Federal Building & Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order dismissing with prejudice the Complaint of Plaintiff Steven J. Trzaska pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted.

**PLEASE TAKE FURTHER NOTICE** that Defendant L'Oréal USA, Inc. shall rely upon the supporting Memorandum of Law and the Declaration of Christopher R. Carton.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is supplied herewith.

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Dated: June 5, 2015